

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No: 1:14-cv-01108-AP

RUTHANN MOOMY
Plaintiff,

v.

CAROLYN W. COLVIN, Acting Commissioner of the
Social Security Administration,
Defendant.

JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

1. APPEARANCES OF COUNSEL

For Plaintiff:

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For Defendant:

Jessica Milano
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Office of General Counsel - Social Security Administration
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2. STATEMENT OF LEGAL BASIS FOR SUBJECT MATTER JURISDICTION

The Court has subject matter jurisdiction based on Section 205(g) of the Social Security Act, 42 U.S.C. 405(g).

3. DATES OF FILING OF RELEVANT PLEADINGS

- A. Date Complaint Was Filed: April 17, 2014
- B. Date Complaint Was Served on U.S. Attorney; April 22, 2014
- C. Date Answer & Administrative Record Were Filed: June 19, 2014

4. STATEMENT REGARDING ADEQUACY OF THE RECORD

The Administrative Record was filed by Defendant on June 19, 2014. Defendant states that, to the best of her knowledge, the certified Administrative Record is complete and accurate. Counsel for Plaintiff has reviewed and believes he has found a one page document – a job description - which does not appear in the Administrative Record as filed.

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

Plaintiff is assessing whether the above-mentioned job description document is superfluous. The Parties are discussing whether it is appropriate to supplement the record.

6. STATEMENT REGARDING WHETHER THIS CASE REAISES UNUSUAL CLAIMS OR DEFENSES

No unusual claims or defenses are anticipated.

7. OTHER MATTERS

This case is *not* on appeal from an ALJ Decision issued on remand. The Parties have no other matters to bring to the attention of the Court.

BRIEFING SCHEDULE

Plaintiff's counsel has several briefing deadlines during the summer of 2014 and the schedule outlined below, to the extent that it varies from the Court's guidelines, accommodates these other briefing deadlines.

- A. Plaintiff's Opening Brief Due: **August 18, 2014**
- B. Defendant's Response Brief Due: **September 19, 2014**
- C. Plaintiff's Replay Brief (If Any) Due: **October 6, 2014**

8. STATEMENTS REGARDING ORAL ARGUMENT

A. Plaintiff's Statement: Plaintiff sees no need for oral argument at this time.

B. Defendant's Statement: Defendant sees no need for oral argument at this time.

9. CONSENT TO EXERCISE OF JURISDICTION BY MAGISTRATE JUDGE

All parties have not consented to the exercise of jurisdiction of a United States Magistrate Judge.

10. AMENDMENTS TO JOINT CASE MANAGEMENT PLAN

THE PARTIES FILING MOTIONS FOR EXTENSION OF TIME OR CONTINUANCES MUST COMPLY WITH D.C. COLO LCivR 7.19C0 BY SUBMITTING PROOF THAT A COPY OF THE MOTION HAS BEEN SERVED UPON THE MOVING ATTORNEY'S CLIENT, ALL ATTORNEYS OF RECORD AND ALL PRO SE PARTIES.

The parties agree that the Joint Case Management Plan may be altered or amended only upon a showing of good cause.

DATED this 9th day of July, 2014.

BY THE COURT:

s/John L. Kane_____

APPROVED:

s/Jessica Milano

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